REMARKS/ARGUMENTS

Applicants respectfully request reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow. Claims 1, 3-5, 7, 8, 10-12, 14, and 29 are being amended to more clearly define Applicants' invention. Claims 2, 6, 9, and 13 are being cancelled, and Claims 31 and 32 are newly added. After amending the claims as set forth above, Claims 1, 3-5, 7, 8, 10-12, 14, 29, 31, and 32 are now pending in this application.

I.   Rejections Under 35 U.S.C. § 103(a)

A.   Claims 1, 2, 5, 8, 9, 12, and 29

In Section 4 of the Office Action, Claims 1, 2, 5, 8, 9, 12, and 29 are rejected under 35 U.S.C. § 103(a) as being unpatentable over United States Patent No. 6,594,490 to Toyoda et al. (hereinafter "Toyoda") in view of United States Patent No. 6,732,177 to Roy (hereinafter "Roy"), and further in view of United States Patent No. 6,654,606 to Foti et al. (hereinafter "Foti"). Applicants respectfully traverse the rejection.

1.   The cited references do not teach a "Serving-Call State Control Function (S-CSCF)," as required by the rejected claims.

Independent Claims 1, 5, 8, 12, and 29, with emphasis added, recite receiving "a registration request" "**at a Serving-Call State Control Function** (S-CSCF)." In Section 4 of the Office Action, the Examiner states that "Toyoda teaches ... forwarding a registration request from the subscriber to a Serving-Call State Control Function (S-CSCF) (see column 2, lines 10-20, column 2, lines 38-57, column 4, lines 48-60 and column 15, lines 40-58), forwarding a location update of the subscriber ... from the S-CSCF to a Home Subscription Server (HSS) (see column 2, lines 10-20, column 2, lines 38-57, column 4, lines 48-60 and column 15, lines 40-58) ...." Applicants respectfully disagree.

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Toyoda discloses a mobile communication system which utilizes "visitor location registers (VLR) and "mobile switching centers (MSCs)" to communicate with and route calls to "mobile stations." (Col. 1, lines 22-24). Contrary to what the Examiner posits, Toyoda does not teach, suggest, or describe a "Serving-Call State Control Function (S-CSCF)." An S-CSCF is a specific network element used to implement telephone calls in a Third Generation-Internet Protocol (3G-IP) network. *Applicants specifically discuss that an S-CSCF is distinct from MSC/VLR elements.* In the present application, Applicants state that in traditional "legacy mobile networks," "a searching/paging mechanism" is used in conjunction with "the serving MSC/VLR" such that a called party can "be reached even after the loss of the subscriber location area (LA) information." (Paragraph [0025]). Thus, the MSC/VLR elements described in Toyoda use a paging mechanism to avoid the problems addressed in the present application. In contrast, S-CSCFs used in traditional 3G-IP networks are unable to "protect[t] ... the TA of a 3G All-IP subscriber from loss." (Paragraph [0004]). Thus, it is clear that an S-CSCF is not the same as the MSC/VLR elements disclosed in Toyoda.

The Examiner also states, in Section 4 of the Office Action, that "Roy teaches forwarding a registration request ... to a ... (S-CSCF) ... [and] forwarding a location update ... from the S-CSCF to a Home Subscription Server (HSS) ... (see column 20, lines 20-24 and column 32, lines 17-24). Applicants respectfully disagree. Roy is directed toward an "intelligent signaling scheme for ... an H.323-based mobility architecture for real-time mobile multimedia communications and conferencing ...." (Abstract). As with Toyoda, Roy fails to teach, suggest, or describe a "Serving-Call State Control Function (S-CSCF)."

2. The cited references do not teach "storage of a transport address (TA) at an HSS," as required by Claims 1, 5 and 12.

Independent Claim 1 also recites "providing the TA and an address of the S-CSCF to a Home Subscription Server (HSS) **for storage at the HSS**." (emphasis added.) Similarly, Claim 8 recites "that the TA and the address of the S-CSCF are **stored at the HSS**." (emphasis added.) Claim 29 recites that "the TA and an address of the S-CSCF" are forwarded "**to a Home**

<u>Subscription Server (HSS) for storage</u>." (emphasis added.) In Section 4 of the Office Action, the Examiner states that "Foti teaches storing data regarding the location update including the ... TA-in the HSS so as to be protected against loss of the location information of the subscriber ... (see column 2, lines 9-24). Applicants respectfully disagree.

At column 2, lines 13-14, <u>Foti</u> discloses "a location server that stores a transport address for the called MS." <u>Foti</u> also indicates that "the Visited CSCF <u>sends a Routing message</u> 48 for the Destination Alias <u>to the Location Server 23</u> in the Serving Network 31. <u>This results in a Response</u> to the Visited CSCF at 49 <u>which indicates the transport address</u> of the Terminating ME 22." (Col. 4, lines 42-47; emphasis added). <u>Foti</u> further discloses that a "Home Network 26 includes a Home Subscriber Server <u>(HSS) 27 ... **and** a Location Server 29</u>." (Col. 3, lines 46-48; emphasis added). Thus, it is clear that <u>Foti</u> discloses storage of a transport address in **a location server which is distinct from the HSS**. Applicants respectfully submit that <u>Foti</u> does not teach, suggest, or describe storage of a transport address (TA) at an HSS.

Claims 5 and 12 recite storing "the TA in a non-volatile memory of the S-CSCF." As discussed above, <u>Toyoda</u> and <u>Roy</u> do not disclose an S-CSCF. Further, <u>Foti</u> only discloses storing a transport address (TA) at "a location server." (Col. 2, lines 13-14). Thus, alone or in combination, <u>Toyoda</u>, <u>Roy</u>, and <u>Foti</u> do not teach, suggest, or describe storing "the TA in a non-volatile memory of the S-CSCF," as recited in Claims 5 and 12.

3. The cited references do not teach "receiving" the TA from the HSS or "restoring" the TA, as required by Claims 1, 5, 8, 12, and 29.

Claims 1, 8, and 29 also recite receiving "the TA" "**from the HSS**" "**in response to a loss of the TA by the S-CSCF**." (emphasis added.) Claims 5 and 12 recite restoring "the TA" "to the S-CSCF" "**from the non-volatile memory** [of the S-CSCF] **in response to a loss of the TA by the S-CSCF**." (emphasis added.) Applicants respectfully submit that, alone or in combination, <u>Toyoda</u>, <u>Roy</u>, and <u>Foti</u> do not teach, suggest, or describe such receiving or restoring limitations.

In Section 4 of the Office Action, the Examiner states that "Foti teaches lost information including the subscriber's TA may be restored to the S-CSCF from the information stored in the HSS (see column 2, lines 9-24). However, as discussed above, Foti only discloses storing a transport address (TA) at "a location server," and not at the HSS. Further, Foti does not disclose storing a transport address within non-volatile memory of an S-CSCF. (Col. 2, lines 13-14).

For at least these reasons, Applicants respectfully submit that, alone or in combination, Toyoda, Roy, and Foti do not disclose each of the limitations recited in independent Claims 1, 5, 8, 12, and 29. Applicants respectfully request withdrawal of the rejection of Claims 1, 5, 8, 12, and 29 under 35 U.S.C. § 103(a). Claims 2 and 9 have been cancelled.

B. Claims 3, 4, 6, 7, 10, 11, 13, and 14

In Section 5 of the Office Action, Claims 3, 4, 6, 7, 10, 11, 13, and 14 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Toyoda in view of Roy and Foti, and further in view of United States Patent No. 6,163,532 to Taguchi et al. (hereinafter "Taguchi"). Applicants respectfully traverse the rejection.

Taguchi is directed toward "a method of packet data transmission in a mobile ... communication system which can be used in a virtual network across a mobile communications network and a LAN." (Col. 1, lines 7-10). Applicants respectfully submit that Taguchi does not teach, suggest, or describe any of the limitations discussed above in Section A. As such, the combination of Toyoda, Roy, Foti, and Taguchi does not disclose each of the limitations recited in independent Claims 1, 5, 8, 12, and 29. For at least these reasons, Applicants respectfully request withdrawal of the rejection of dependent Claims 3, 4, 7, 10, 11, and 14. Claims 6 and 13 have been cancelled.

II.   Newly Added Claims 31 and 32

Newly added Claims 31 and 32 depend from independent Claims 1 and 29, respectively. As such, Applicants respectfully submit that Claims 31 and 32 are in condition for allowance for at least the same reasons discussed with reference to Claims 1 and 29.

Applicants believe that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.
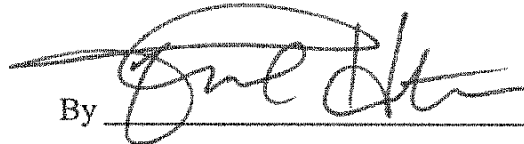
The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 19-0741. Should no proper payment be enclosed herewith, as by a check or credit card payment form being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 19-0741. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicants hereby petition for such extension under 37 C.F.R. §1.136 and authorize payment of any such extensions fees to Deposit Account No. 19-0741.

Respectfully submitted,

Date __August 2, 2007__   By _____

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